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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,) Case No: CR-14CR-00168-TOR-2
Plaintiff,)
vs.) DECLARATION IN SUPPORT OF
BRENDA SUE LYNCH) NOTICE OF INTENT TO FILE REPLY
Defendant) MEMORANDUM ON HEARING DATE
)
)
)

John C. Perry, being fully aware of the penalties for perjury in the State of Washington, Declares as follows:

I am the appointed counsel for Defendant, Brenda Lynch in this matter.

Pending before the Court is Ms. Lynch's motion for withdrawal of her guilty plea. On December 10, 2015 the Court ordered the government to respond by December 17, 2015 and Ms. Lynch to file her reply if any, pursuant to the local rule. The court stated it would hear the motion without oral argument on December 28. No filing by the Government showed up on the ECF system and on Monday, December 21, 2015, and I received by mail a 19 page memorandum accompanied by voluminous attachments filed under seal on December 17.

The local rule applicable to response memoranda is:

**DECLARATION IN SUPPORT OF
NOTICE OF INTENT TO FILE REPLY
MEMORANDUM ON HEARING DATE**

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1 be filed within seven days (LR 7.1). Given the approaching Christmas holiday, I will need all
2 7 days to prepare my response. Therefore my response will be filed on the date set for the
3 hearing, December, 28, 2015.

4 I affirm that the information contained in this Declaration is true and correct.

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6 Dated this 22nd day of December, 2015 at Spokane, Washington
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9 /s/

10 John C. Perry WSBA 16041

11 Attorney for Defendant

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28 DECLARATION IN SUPPORT OF
29 NOTICE OF INTENT TO FILE REPLY
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1 CERTIFICATION OF SERVICE
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3 I HEREBY CERTIFY that on December 22, 2015, I electronically filed
4 foregoing with the Clerk of Court using the CM/ECF system which will send
5 notice of such filing to the following: George JC Jacobs III, Assistant United
6 States Attorney.

7 Dated this 22nd day of December, 2015

8 /s/ John C. Perry
9 Attorney for Defendant

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-3

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